ESTTA Tracking number:

ESTTA586049 02/06/2014

Filing date:

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91210103
Party	Plaintiff
	The Coca-Cola Company
Correspondence Address	CYNTHIA PARKS PARKS IP LAW
	730 PEACHTREE STREET NE, SUITE 600
	ATLANTA, GA 30308 UNITED STATES
	tmdocketing@parksiplaw.com, cparks@parksiplaw.com, vkeenan@coca-cola.com
Submission	Motion to Amend Pleading/Amended Pleading
Filer's Name	Cynthia R. Parks
Filer's e-mail	cparks@parksiplaw.com, tmdocketing@parksiplaw.com, vthomas@parksiplaw.com, kherrick@parksiplaw.com, dalper@parksiplaw.com
Signature	/Cynthia R. Parks/
Date	02/06/2014
Attachments	Opposer's Motion to Amend Complaint - COKI COLA HAPPY MOTION.pdf(131741 bytes)
	Amended Notice of Opposition - COKI COLA HAPPY MOTION.pdf(538597 bytes)
	Redlined - Amended Notice of Opposition for COKI COLA HAPPY MOTION.pdf(663095 bytes)
	Certificate of Service - COKI COLA HAPPY MOTION.pdf(28225 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re:

Application No. 85/672,347 COKI COLA HAPPY MOTION

Mark: Filed:

July 10, 2012

Published: December 18, 2012

THE COCA-COLA COMPANY

Opposer,

٧.

Opposition No. <u>91210103</u>

ALBERTO SOLER, DBA COKI LOCO

and

MIRIAM SOLER

Applicants.

OPPOSER'S MOTION TO AMEND COMPLAINT

Opposer The Coca-Cola Company ("Opposer"), by and through its undersigned counsel and in accordance with Rule 2.127 of the Trademark Rules of Practice, files this Motion to Amend Complaint (the "MTA"), with the attached Amended Notice of Opposition, in response to the Board's ruling dated February 3, 2014 (the "Ruling"). In the Ruling, the Board indicated that if Opposer remains interested in amending its complaint to assert claims of fraud and false suggestion of a connection, its recourse is to file a motion to amend pursuant to Fed. R. Civ. P. 15, accompanied by an amended complaint that complies with Trademark Rule 2.104 and asserts Opposer's standing and each of its claims of relief. Ruling at 6. Accordingly, Opposer is submitting the MTA

and respectfully requests that the claim of fraud be added to its original complaint, as indicated in the attached Amended Notice of Opposition. Opposer is submitting the Amended Notice of Opposition in red-lined form as well as clean form, as recommended. TMBP §507.01.

REQUEST FOR LEAVE TO AMEND COMPLAINT

According to Fed. R. Civ. P. 15(a)(2), if the amended complaint is filed after 21 days from the serving of the original complaint and not within 21 days after service of a responsive pleading, "a party may amend its pleading only with the opposing party's written consent or the court's leave," and "The court should freely give leave when justice so requires." TBMP, §507.01. Opposer respectfully requests leave of the Board to amend its Notice of Opposition, as such leave would serve the interest of justice.

The Rules note that "the Board liberally grants leave to amend pleadings at any stage of a proceeding when justice so requires, unless entry of the proposed amendment would violate settled law or be prejudicial to the rights of the adverse party or parties." TMBP §507.02. The Rules further specify that this leave should be given "even when a plaintiff seeks to amend its complaint to plead a claim other than those stated in the original complaint." Id. In the attached Amended Notice of Opposition, Opposer seeks to respond to issues raised by the Board in a previous ruling and to modify its earlier response as indicated by the Board. Accordingly, Opposer submits that the interests of justice would be served by granting the Opposer leave to file the Amended Notice of Opposition.

Finally, the Applicants have yet to file an Answer in the subject Opposition, and therefore, the allowance of an amended complaint at this time would not be prejudicial

to Applicants' rights. While the TBMP states that "a long and unexplained delay in filing

a motion to amend a pleading...may render the amendment untimely" (§507.02(a)), in

the matter at hand Opposer had filed a previous response and the proceedings had

been suspended pending the resolution of several motions filed by Applicants. The

attached Amended Notice of Opposition was previously submitted in the form of a brief,

and therefore Applicants have been fully aware of the bases for the Amended Notice of

Opposition since that date. Opposer has been responsive at all stages of these

proceedings and has not attempted to delay or prejudice Applicants.

CONCLUSION

Therefore, Opposer respectfully requests leave from the Board to file the

attached Amended Notice of Opposition.

Respectfully submitted this 6th day of February, 2014.

PARKS IP LAW LLC

730 Peachtree Street NE

Suite 600

Atlanta, Georgia 30308

Phone: 678-365-4444

Fax:

678-365-4450

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re:

Application No. 85/672,347 COKI COLA HAPPY MOTION

Mark: Filed:

July 10, 2012

Published: December 18, 2012

THE COCA-COLA COMPANY

Opposer,

V.

MIRIAM SOLER

and

ALBERTO SOLER, DBA COKI LOCO

Applicants.

Opposition No. 91210103

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AMENDED NOTICE OF OPPOSITION

THE COCA-COLA COMPANY ("TCCC," or "Opposer"), a Delaware corporation having its principal place of business at One Coca-Cola Plaza, Atlanta Georgia 30313, believes that it would be damaged by registration of the mark COKI COLA HAPPY MOTION ("Applicant's Mark") for:

"Entertainment in the nature of an on-going special variety, news, music or comedy show featuring Fictional Character named Coki Loco broadcast over television, satellite, audio, and video media; Entertainment services, namely, providing a website at which the general public can receive advice from an individual or entity concerning happiness, such advice being for entertainment purposes only; Entertainment services, namely, providing a website featuring games and puzzles; Entertainment services, namely, providing an on-line computer game; Entertainment services, namely, providing online computer games that help maintain an active brain and thus improve memory, speed of processing, and that provide a variety of cognitive benefits that positively impact quality of life; Entertainment services, namely, providing online video games; Providing a

website featuring information in the field of music and entertainment; Providing a website featuring information in the fields of education and entertainment for children; Providing a website featuring information on exercise and fitness; Providing a website featuring non-downloadable videos, namely, video presentations of a comedic nature; Providing a website featuring online sports training and training advice and the recording of training and workouts; Providing an interactive website featuring information and links relating to fitness; Providing an Internet website portal in the field of music"

in International Class 41, which mark is the subject of application Serial No. 85/672,347 (the "Application"), filed on July 10, 2012 by Miriam Soler as an individual and Alberto Soler, doing business as Coki Loco (both collectively referred to herein as "Applicant"), and published for opposition in the Official Gazette on December 18, 2012. By and through its undersigned attorney, TCCC hereby opposes the Application.

The grounds for this Opposition are as follows:

- 1. Opposer is the world's largest beverage company, serving more than 1.6 billion consumers each day, in more than 200 countries around the world. Opposer's COCA-COLA, COKE and DIET COKE brands are cornerstones of its portfolio, which presently includes fifteen billion dollar brands. COCA-COLA and DIET COKE are the top two soft drink brands in the world.
- 2. Opposer is the owner of numerous federal registrations and pending applications for its COCA-COLA and COKE family of trademarks (collectively, the "COCA-COLA Marks"), including:

Trade	emark	Registration	n Date	Goods
Cox Cola	Reg. No. 238,146 Incontestable	January 31, 1		Class 32 Beverages and syrups for the manufacture of such beverages

Trade	emark	Registration Date	Goods
COCA-COLA	Reg. No. 238,145 Incontestable	January 31, 1928	Class 32 Beverages and syrups for the manufacture of such beverages
Coke	Reg. No. 415,755 Incontestable		Class 32 Non-alcoholic maltless beverages and the syrups for making such beverages
Coke Coke	Reg. No. 1,260,160 Incontestable	December 6, 1983	Class 32 Soft Drinks
CocaCola	Reg. No. 1,432,152 Incontestable	December 16, 1986	Class 32 Soft drinks
COKE CLASSIC	Reg. No. 1,824,556 Incontestable	March 1, 1994	Class 32 Soft drinks and syrups and concentrates for making the same.
VANILLA COKE	Reg. No. 2,757,341 Incontestable	December 31, 2002	Class 32 Non-alcoholic beverages, namely, soft drinks
COKE	Reg. No. 3,347,889 Incontestable	December 4, 2007	Class 32 Non-alcoholic beverages, namely, soft drinks; syrups and concentrates for making non-alcoholic beverages, namely, soft drinks.
CHERRY COKE	Reg. No. 3,434,466	March 11, 2008	Class 32 Non-alcoholic beverages, namely, soft drinks; concentrate for making non-alcoholic beverages, namely, soft drinks.

Trade	emark	Registration Date	Goods
DIET COKE PLUS	Reg. No. 3,490,468	August 19, 2008	Class 32 Non-alcoholic beverages, namely, carbonated soft drinks; syrups and concentrates for making beverages, namely, carbonated soft drinks.
DIET COKE	Reg. No. 3,820,750	July 20, 2010	Class 32 Non-alcoholic beverages, namely, soft drinks; syrups and concentrates for making non-alcoholic beverages, namely, soft drinks.
COCA-COLA FAN LOT	Reg. No. 2,607,376		Class 32 Soft drinks, syrups and concentrates for use in the preparation of soft drinks Class 41 Entertainment services in the nature of interactive area at baseball stadiums, namely a structure composed of wood beams, climbing areas and slides; Entertainment in the nature of a youth baseball theme park featuring miniature baseball fields on which children can hit, run and catch baseballs; and entertainment services, namely, providing static exhibits of embossed signatures of famous baseball players that can be rubbed to create autographs.
COCA-COLA SCREEN PLAY	Reg. No. 2,150,823		Class 41 Entertainment services in the nature of film trivia slides displayed on-screen in movie theaters.

All of these filings are valid and subsisting, in full force and effect, and are conclusive evidence of Opposer's exclusive right to use the COCA-COLA Marks for the goods and services referenced therein as well as for related goods and services.

- 3. Opposer has used the COCA-COLA Marks continuously in interstate commerce, and is and has been at all pertinent times the owner of all right, title and interest in and to the COCA-COLA Marks for a wide range of goods and services, including entertainment services in Class 41.
- 4. Opposer has invested a substantial amount of time, effort and money to promote its products and services offered under the COCA-COLA Marks, as well as to promote its corporate identity. In fact, Opposer spends hundreds of millions of dollars each year on measured media in connection with the COCA-COLA Marks, along with millions more on other media touchpoints, such as sponsorships, product placement, premiums, and coupons.
- 5. Accordingly, consumers exclusively associate Opposer's COCA-COLA Marks with Opposer, and the COCA-COLA Marks have established good will and enjoy fame of incalculable value in the U.S. and throughout the world.

FIRST BASIS FOR OPPOSITION – OWNERSHIP OF PRIOR REGISTRATIONS

- 6. The Application is based on the Applicant's purported intent to use Applicant's Mark, and therefore, the Application claims no date of first use.
- 7. Upon information and belief, Applicant is unable to establish priority of use of Applicant's Mark with respect to Opposer's COCA-COLA Marks.

8. Opposer has clear priority, given the longstanding use and registrations of the COCA-COLA Marks.

SECOND BASIS FOR OPPOSITION – LIKELIHOOD OF CONFUSION

- 9. Opposer would be damaged by registration of Applicant's Mark because Applicant's Mark is confusingly similar in appearance, sound and meaning to the COCA-COLA Marks, which the public exclusively associates with Opposer. Specifically, the "COKI" term in Applicant's Mark is nearly identical in sight, sound, and meaning to the Opposer's famous COKE marks, and the "COKI COLA" combination is nearly identical to the COCA-COLA portion of the COCA-COLA Marks. Given that Applicant's services make reference to a character named "Coki Loco" and not "Coki Cola," it appears likely that the COLA term was incorporated into Applicant's Mark primarily to cause confusion with Opposer's famous COCA-COLA Marks.
- 10. The similarities between Applicant's Mark and the COCA-COLA Marks, in conjunction with Applicant's intent to use its Mark in connection with entertainment services substantially related to those that Opposer offers under its COCA-COLA Marks, is likely to cause confusion, or to cause mistake, or to deceive with respect to the source or origin of Applicant's services, and is likely to cause consumers to believe Opposer sponsors or is affiliated with the Applicant. Such confusion would irreparably harm Opposer, particularly because Opposer has no control over the nature or quality of the services provided or produced by Applicant under Applicant's Mark. Opposer takes extensive measures to ensure the quality of any goods and services offered under its COCA-COLA Marks, and it would suffer irreparable harm if Applicant is allowed to offer the proposed services under Applicant's Mark without any quality control by Opposer.

11. Upon information and belief, the services that Applicant intends to offer under the COKI COLA HAPPY MOTION mark and those offered by the Opposer under certain of the COCA-COLA Marks are closely related, are or may be offered through the same, substantially the same, and/or related channels of distribution, and to the same, substantially the same, and/or related classes of purchasers; and are or may be advertised, marketed and promoted through the same media channels. The Company's prior-filed and registered marks COCA-COLA FAN LOT and COCA-COLA SCREENPLAY are a representative examples of its COCA-COLA Marks covering related entertainment services. The risk of confusion with Opposer's famous COCA-COLA Marks is especially high given that Applicant appears to be aiming its services at an audience of young children, who would be impressionable, unsophisticated consumers.

THIRD BASIS FOR OPPOSITION – DILUTION

12. The COCA-COLA Marks are famous marks within the meaning of Section 43(c) of the Lanham Act, and became famous long before the date of the application to register Applicant's Mark. The use by Applicant of Applicant's Mark for Applicant's proposed services would be likely to cause dilution, by blurring the distinctive quality of Opposer's famous COCA-COLA Marks, by tarnishing the reputation of Opposer's famous COCA-COLA Marks, or both.

FOURTH BASIS FOR OPPOSITION - FRAUD

13. Upon information and belief, the Application is related to at least one other pending application for a trademark that also infringes Opposer's rights in and to the COCA-COLA Marks, namely trademark application Serial No. 85/607,106 for the term COLA DE COKI. Accordingly, Opposer has reason to believe that Applicant has

intentionally misidentified the true owner of the Application, and may have otherwise committed fraud in the attempt to register Applicant's Mark. It has also come to Opposer's attention that this pattern of fraud extends to an entire family of applications for COKI formative marks all filed by entities that appear to have misrepresented the nature of their relationship to one another.

- 14. Opposer has reason to believe that Applicant has intentionally misidentified the true owner of the Application, and may have otherwise committed fraud in the attempt to register Applicant's Mark. It has also come to Opposer's attention that this pattern of fraud extends to an entire family of applications all filed by entities that appear to have misrepresented the nature of their relationship to one another, including Ser. No. 85/619,035 for COKI, 85/813,590 for UR COCA COLA, 85/738,874 for DKO, 85/097,54 for COCALEAF, 85/607,106 for COLA DE COKI, 85/756,565 for COCA-LISCIOUS, 85/756,528 for COCA, 85/095,398 for COCA LEAF WATER, and 85/741,161 for DOKE. Opposer believes, based upon communications with Applicant Alberto Soler, that this pattern of behavior by Applicant is no mere false or accidental misunderstanding but is rather a pattern of materially false statements made with the intent to deceive the Patent and Trademark Office.
- Applicant Miriam Soler does not have any true connection to the subject application, and her inclusion in the application was part of a scheme by Alberto Soler intended to defraud the PTO. Accordingly, it appears that Applicant Alberto Soler has knowingly made several false, material representations with regard to the ownership of this application and others with the intent to deceive the PTO.

16. Applicant Alberto Soler has also indicated in communications with Opposer's counsel that he purposefully filed the cited applications under different names in order to circumvent what he believed to be a legal restriction on U.S. trademark ownership based upon his Cuban citizenship.

FIFTH BASIS FOR OPPOSITION - LACK OF BONA FIDE INTENT TO USE

17. Upon information and belief, and in view of the forgoing, Applicant lacks a bona fide intent to use Applicant's Mark. In particular, intentional selection of an infringing mark and misidentification of the true owner(s) of the present application belies Applicant's claim that Applicant has any real and legitimate stake in acquiring a registration.

CONCLUSION

18. For at least the forgoing reasons, Opposer will be damaged by Applicant's registration of Applicant's Mark.

WHEREFORE, Opposer respectfully requests that this Opposition be sustained and that the Application for registration by Applicant be refused.

Respectfully submitted this 6th day of February, 2014.

PARKS IP LAW LLG

⊘ynthia R. Parks

730 Peachtree Street NE Suite 600

Atlanta, Georgia 30308 Phone: 678-365-4444 Fax: 678-365-4450

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AMENDED NOTICE OF OPPOSITION

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website featuring infarmation information in the field afof music and entertainment; Providing a website featuring information in the fields of education and entertainment for children; Providing a website featuring information on exercise and fitness; Providing a website featuring non-downloadable videos, namely, video presentations of a comedic nature; Providing a website featuring online sports training and training advice and the recording of training and workouts; Providing an interactive website featuring information and links relating tofitness to fitness; Providing an Internet website portal in the field of music"

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in International Class 41, which mark is the subject of application Serial No. 85/672,347347 (the ""Application","), filed on July 10, 2012 by Miriam Soler as an individual and Alberto Soler, doing business as Coki Loco (both collectively referred to herein as ""Applicant",") and published for opposition in the Official Gazette on December 18, 2012. By and through its undersigned attorney, TCCC hereby opposes the Application.

The grounds for this Opposition are as follows:

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1. Opposer is the world's largest beverage company, serving more than 1.6 billion consumers each day, in more than 200 countries around the world. Opposer's Opposer's COCA-COLA, COKE and DIET COKE brands are cornerstones of its portfolio, the top two soft drink brands in the world.

2. Opposer is the owner of numerous federal registrations and pending applications for its COCA_COLA and COKE family of trademarks (collectively, the "COCA--COLA -Marks","), including:

which presently includes fifteen billion dollar brands. _COCA-_COLA and DIET COKE are

Trade	emark	Registration Date	Goods
Coca Cola	Reg. No. 238,146	January 31, 1927	Class 32 B
	Incontestable		Beverages and syrups for the

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COCA-COLA	Reg. No. 238,145	January 31, 1928	Class 32	
Trade	<u>emark</u>	Registration Date	Goods	_ 📆
Coca Cota	Reg. No. 238,146 Incontestable	January 31, 1927	Class 32 Beverages and syrups for the anufacture manufacture, of such beverages	
COCA-COLA	Reg. No. 238,145 Incontestable	January 31, 1928	Class 32 Beverages and syrups for the manufacture of such beverages	
Coke	Reg. No. 415,755	August 14, 1945	August 14, 1945 onClass 32	+
Coke Coke			Non- alcoholic alcoholic ma/l/essmaltl ess beverages and the syrups for making such everages beverages	
Coke Coke	Reg. No. 1,260,160 Incontestable	<u>December 6, 1983</u>	December 6, 1983_Class_32 Soft Drinks	4
Oca Cola	Reg. No. 1,432,152 Incontestable	<u>December 16,</u> 1986	December 16, 1986, Class 32 Soft drinks	4

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Trade	<u>emark</u>	Registration Date	Goods	_ ₹
COKE CLASSIC	Reg. No. 1,824,556 Incontestable	<u>March 1, 1994</u>	March 1, 1994 Class 32 Soft drinks and syrups and concentrates for making the same.	4
VANILLA COKE	Reg. No. 2,757,341 Incontestable	December 31, 2002	Class 32 Non-alcoholic beverages, namely, soft drinks	\
VANILLA COKE	Reg.,No., 2,757,3413,347,889 Incontestable	December, 21, 20024, 2007	Class 32 onNon-alcoholic beverages, namely, off drinks on-alcoholic beverages, namely, offsoff drinks; syrups and concentrates for making non- alcoholic beverages, namely, soft drinks.	•
COKE	Reg. No. 3,347,889 Incontestable	December 4, 2007		
CHERRY COKE	Reg., No., 3,434,466	March 11, 2008	March 11, 2008 Class, 32 Non- alcoholic beverages, namely, soft drinks; concentrate for, makin enmaking non- alcoholic beverages, namely,	
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Trade	<u>emark</u>	Registration Date	Goods
DIET COKE PLUS	Reg. No. 3,490,468	August 19, 2008	Class 32 Non-alcoholic beverages, namely, carbonated soft drinks; syrups and concentrates for making beverages, namely, carbonated soft drinks.
<u>DIET COKE</u>	Reg. No. 3,820,750	July 20, 2010	Class 32 Non-alcoholic beverages, namely, soft drinks; syrups and concentrates for making non-alcoholic beverages, namely, soft drinks.
COCA-COLA FAN LOT	Reg. <u>No.</u> 2,607,376	August 13,2002	Soft drinks, syrups and concentrates for use in the preparation of soft drinks Class 41 Entertainment services in the nature of interactive area at baseball stadiums, namely a structure composed of wood beams, climbing areas and slides; Entertainment in the nature of a youth baseball theme park featuring miniature baseball fields on which children can hit, run and catch baseballs; and entertainment services, namely, providing static exhibits of embossed signatures of famous baseball players that can be rubbed to create autographs.
COCA-COLA SCREEN PLAY	Reg. No. 2,150,823	April 14, 1998	Class 41 Entertainment services in the nature of film trivia slides displayed on-screen in movie theaters.

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App. Ser. No. 85/494,701

DIET COKE DLUG		August 10 2008	Class 32
Trade	mark	Registration Date	Goods
	COCA-COLA MOVE TO THE BEAT		carbonated soft drinks; syrups are concentrates for making everages, namely, carbonated oft drinks.
DIET COKE	Reg. No. 3,820,750	July 20, 2010	Mass 32 Non-alcoholic beverages, namely, soft drinks; syrups and concentrates for making non-alcoholic beverages, namely, soft drinks.
COCA-COLA FAN	Reg. No. 2,607,376	August 13,2002	Class 32 Soft drinks, syrups and
			concentrates for use in the reparation or soft drinks Class 41 Entertainment services in the ature of interactive area at aseball stadiums, namely a structure composed of wood earns, climbing areas and slides; Entertainment in the nature of a outh baseball theme park eaturing miniature baseball fields
			on which children can hit, run and catch baseballs; and entertainment services, namely, reviding static exhibits of embossed signatures of famous aseball players that can be ubbed to create autographs.
COCA-COLA SCREEN PLAY	Reg. No. 2,150,823	April 14, 1998	Class 41 Entertainment services in the ature offilm trivia slides displayed on-screen in movie theaters.

Published January Class 9 8, 2013

Digital media, namely,

ly, dable usical performances

Class 41

downloadable pre-recorded audio and video recordings featuring

Enterlainment services, namely, reviding live musical orformances; Enterlainment services, namely, providing a website featuring non-

downloadable, pre-recorded usical performances.

All of these filings are valid and subsisting, in full force and effect, and are conclusive evidence of opposer's exclusive right to use the COCA-COLA Marks for the goods and services referenced therein as well as for related goods and services.

- 3. Opposer has used the COCA-COLA Marks continuously in interstate commerce, and is and has been at all pertinent times the owner of all right, title and interest in and to the COCA-COLA Marks -for a wide range of goods and services, including entertainment, services in Class 41.
- 4. Opposer has invested a substantial amount of time, effort and money to promote its products and services offered under the COCA-COLA Marks, as well as to promote its corporate identity. In fact, Opposer spends hundreds of millions of dollars each year on measured media in connection with the COCA-COLA Marks, along with millions more on other media touchpoints, such as sponsorships product placement, premiums, and coupons.

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5. Accordingly, consumers exclusively associate Opposer's Opposer's COCA-COLA Marks with Opposer, and the COCA-COLA Marks have established good will and enjoy fame of incalculable value in the U.S. and throughout the world.

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FIRST BASIS FOR OPPOSITION - OWNERSHIP OF PRIOR REGISTRATIONS

- 6. The Application is based on the Applicant's Applicant's purported intent to use Applicant's Mark, and therefore, the Application claims no date of first use.
- 7. Upon information and belief, Applicant is unable to establish priority of use of Applicant's Applicant's Mark with respect to Opposer's COCA-COLA Marks.
- 8. Opposer has clear priority, given the longstanding use and registrations of the COCA-COLA Marks.

SECOND BASIS FOR OPPOSITION - LIKELIHOOD OF CONFUSION

9. Opposer would be damaged by registration of Applicant's Mark because Applicant's Mark is confusingly similar in appearance, sound and meaning to the COCA-COLA Marks, which the —public -exclusively -associates -with Opposer. Specifically, the "COKI" term in Applicant's Applicant's Mark is nearly identical in sight, sound, and meaning to the Opposer's Opposer's famous COKE marks, and the "COKI COLA" combination is nearly identical to the COCA-COLA portion of the COCA-COLA Marks. Given that Applicant's Applicant's services make reference to a character named "Coki Loco" and not "Coki Cola," it appears likely that the COLA term was incorporated

into Applicant's Mark primarily to cause confusion with Opposer's famous

COCA-COLA Marks.

10. The similarities between Applicant's Applicant's Mark and the COCA-COLA

Marks, in conjunction -with Applicant's Applicant's intent -to -use -its -Mark -in -connection

with -entertainment

10. services substantially related to those that Opposer offers under its COCA-COLA Marks, is likely to cause confusion, or to cause mistake, or to deceive with respect to the source or origin of Applicant's Applicant's services, and is likely to cause consumers to believe Opposer sponsors or is affiliated with the Applicant. Such confusion would irreparably harm Opposer, particularly because Opposer has no control over the nature or quality of the services provided or produced by Applicant under Applicant's Mark. Opposer takes extensive measures to ensure the quality of any goods and services offered under its COCA-COLA Marks, and it would suffer irreparable harm if Applicant is allowed to offer the proposed services under Applicant's Applicant's Mark without any quality control by Opposer.

11. Upon information and belief, the services that Applicant intends to -offer under the COKI COLA HAPPY MOTION mark and those offered by the Opposer under certain of the COCA-COLA Marks are closely related, are or may be offered through the same, substantially the same, and/or related channels of distribution, and to the same, substantially the same, and/or related classes of purchasers; and are or may be advertised, marketed and promoted through the same media channels. The company's Company's prior-filed and presently allowed application to register the markregistered marks COCA-COLA MOVE TO THE BEAT is FAN LOT and COCA-COLA SCREENPLAY are a representative examples of its COCA-COLA Marks covering related entertainment services. The risk of confusion with opposer's Opposer's famous of COCA-COLA Marks is especially high given that Applicant appears to be aiming its services at an audience of young children, who would be impressionable, unsophisticated consumers.

THIRD BASIS FOR OPPOSITION - DILUTION

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42. The COCA-COLA Marks are famous marks within the meaning of Section

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43(c) of the Lanham Act, and became famous long before the date of the application to

12. register Applicant's Applicant's Mark, The use by Applicant of Applicant's Applicant's Mark for Applicant's Applicant's Proposed services would be likely to cause dilution, by blurring the distinctive quality of Opposer's Opposer's famous COCA-COLA Marks, by tarnishing the reputation of Opposer's Opposer's famous COCA-COLA Marks, or both.

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FOURTH BASIS FOR OPPOSITION - FRAUD

13. Upon information and belief, the Application is related to at least one otherpending application for a trademark that -also infringes -Opposer's rights in and to
the COCA-COLA Marks, namely trademark application Serial No. 85/607,106 for the term
COLA DE COKI. Accordingly, Opposer has reason to believe that Applicant has
intentionally misidentified the true owner of the Application, and may have otherwise
committed fraud in the attempt to register Applicant's Applicant's Mark. It has also come to
Opposer's Opposer's attention that this pattern of fraud extends to an entire family of
applications for COKI formative marks all filed by entities that appear to have
misrepresented the nature of their relationship to one another.

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14. Opposer has reason to believe that Applicant has intentionally misidentified the true owner of the Application, and may have otherwise committed fraud in the attempt to register Applicant's Mark. It has also come to Opposer's attention that this pattern of fraud extends to an entire family of applications all filed by entities that appear to have misrepresented the nature of their relationship to one another, including Ser. No. 85/619,035 for COKI, 85/813,590 for UR COCA COLA, 85/738,874 for DKO, 85/097,54 for COCALEAF, 85/607,106 for COLA DE COKI, 85/756,565 for COCA-LISCIOUS, 85/756,528 for COCA, 85/095,398 for COCA LEAF WATER, and 85/741,161 for DOKE. Opposer believes, based upon communications with Applicant Alberto Soler, that this pattern of behavior by Applicant is no mere false or accidental misunderstanding but is

rather a pattern of materially false statements made with the intent to deceive the Patent and Trademark Office.

- 15. Based upon communications with Applicant Alberto Soler, it appears that Applicant Miriam Soler does not have any true connection to the subject application, and her inclusion in the application was part of a scheme by Alberto Soler intended to defraud the PTO. Accordingly, it appears that Applicant Alberto Soler has knowingly made several false, material representations with regard to the ownership of this application and others with the intent to deceive the PTO.
- 16. Applicant Alberto Soler has also indicated in communications with Opposer's counsel that he purposefully filed the cited applications under different names in order to circumvent what he believed to be a legal restriction on U.S. trademark ownership based upon his Cuban citizenship.

FIFTH BASIS FOR OPPOSITION - LACK OF BONA FIDE INTENT TO USE

44.17. Upon information and belief, and in view of the forgoing, Applicant Jacks as bona fide intent to use Applicant's Applicant's Mark. In particular, intentional selection of an infringing mark and misidentification of the true owner(s) of the present application belies Applicant's claim that Applicant has any real and legitimate stake in acquiring a registration.

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CONCLUSION	· +	Formatted: Font: 12 pt, Underline, (Intl) Arial	
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45.18. For at least the forgoing reasons, Opposer will be damaged by	, i	Formatted: Font: 12 pt, Bold, Underline	
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Applicant's Applicant's registration of Applicant's Applicant's Mark. WHEREFORE, Opposer respectfully requests that this Opposition be sustained		Formatted: List Paragraph, Justified, Indent: Lef line: 0.5", Right: 0", Line spacing: Double, Num Level: 1 + Numbering Style: 1, 2, 3, + Start at: Alignment: Left + Aligned at: 0.5" + Indent at: 0 stops: Not at 1.1"	bered +
and that the Application for registration by Applicant be refused.		Formatted	[109]
and that they application to glotication by applicant so to account		Formatted	[110]
Respectfully submitted, this s#6th day of April, 2013February, 2014.		Formatted	[[111]
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<u>/s/</u> Cynthia_RParksCynthia_R. Parks_		Formatted: Justified, Indent: Left: 0", First line: 0", Space After: 0 pt, Line spacing: single, Tab s at 6.38"	
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Attorney for Opposer	111	Formatted	[[116]
THE COCA COLA COMPANY		Formatted	[[117]
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CERTIFICATE OF SERVICE

This is to certify, in accordance with Rule 2.101(b) of the

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Trademark Rules of Practice, that I have this day served the foregoing

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Opposition of the Applicants, by causing a true and correct copy thereof to be deposited in the United States Mail, postage prepaid, addressed to the attorney of record for the Applicants as follows:

Alberto-Soler
OBA Coki Loco
7700 N. Kendall Drive
Suite 701
Miami, Florida 33156

Miriam Soler 4741 NW 5th Street Miami, Florida 33126

Laudis Moreira

Domestic Representative Banah Sugar/UR COLA

215 SE 10th Avenue (Banah Sweetway) Hialeah, Florida 33010 thenewkidentheb/ock@live.com

This 5th day of April, 2013.

/s/ Cynthia R. Parks Cynthia R. Parks

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CERTIFICATE OF SERVICE

This is to certify, in accordance with Rule 2.101(b) of the Trademark Rules of Practice, that I have this day served the foregoing **Opposer's Motion to Amend Complaint** and **Amended Notice of Opposition** by electronic mail to the addresses of record and by causing a true and correct copy thereof to be deposited in the United States Mail, postage prepaid, addressed to the Applicants and/or their attorneys of record as follows:

Alberto Soler d/b/a Coki Loco and Miriam Soler The Red Luna KO Soler Law Firm 11003 NW 33 Street Doral, FL 33172 solerlawfirm@att.net, redlunalaw@att.net

This 6th day of February, 2014.

🕅nthia R. Parks